

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CIPHERBLADE, LLC, a Pennsylvania Limited Liability Corporation,

Plaintiff,

v.

CIPHERBLADE, LLC, an Alaska Limited Liability Corporation, MANUEL KRIZ, MICHAEL KRAUSE, JORN HENRIK BERNHARD JANSSEN, SERGIO GARCIA, JUSTIN MAILE, IOANA VIDRASAN,

and

CIPHERBLADE APAC PTE LTD, a Singapore Limited Company, JUSSI AITTOLA,

and

OMEGA3ZONE GLOBAL LTD, a Cyprus Limited Company, PAUL MARNITZ,

and

INQUISITA SOLUTIONS LTD., a Cyprus Limited Company

and

GREEN STONE BUSINESS ADVISORY FZ LLC, a United Arab Emirates Limited Liability Corporation.,

Defendants.

Case No. 1:23-cv-05671-AKH

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT, upon the accompanying memorandum of law and declaration of Michael Scavelli (with exhibits), Defendants CipherBlade, LLC, an Alaska Limited Liability Corporation, Manuel Kriz, Michael Krause, Jorn Henrik, Bernhard Janssen, Justin Maile, Ioana Vidrasan, CipherBlade APAC PTE Ltd., a Singapore Limited Company,

Jussi Aittola, Omega3Zone Global Ltd., a Cyprus Limited Company, Paul Marnitz, Inquisita Solutions Ltd., a Cyprus Limited Company, and Green Stone Business Advisory FZ LLC, a United Arab Emirates Limited Liability Corporation (collectively, “Defendants”), will move this Court, before the Honorable Judge Alvin K. Hellerstein, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, as soon as counsel may be heard, for an order dismissing Plaintiff’s Amended Complaint (ECF No. 7) for lack of personal jurisdiction pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure, improper venue pursuant to Rule 12(b)(3) of the Federal Rules of Civil Procedure, lack of subject matter jurisdiction over Count 1 pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure, and applicable law.

Pursuant to the Court’s direction at the July 26, 2023 conference in this case (*see* Hearing Transcript, at 5), Plaintiff’s opposition papers are due on August 9, 2023 and Defendants’ reply submission is due on August 14, 2023.

Dated: August 2, 2023

Respectfully submitted,

STEPTOE & JOHNSON LLP

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